

United States
Department of
Agriculture

Forest
Service

Rocky
Mountain
Region

P.O. Box 25127
Lakewood, CO 80225-0127
Delivery: 740 Simms St.
Golden, CO 80401
Voice 303-275-5350
TTY 303-275-5367

File Code: 2580

Date: July 7, 1997

Mr. Bernie Dailey
Air Quality Division
Department of Environmental Quality
122 West 25th Street
Cheyenne, WY 82002

Dear Mr. Dailey:

This letter is in regard to the Prevention of Significant Deterioration (PSD) permit application for the proposed expansion of the Solvay soda ash facility. We are pleased to note that the facility will offset the NOx emissions increase from the expansion.

As you are aware, the Forest Service is very concerned about the impact that cumulative emissions from southwest Wyoming sources may have on Class I areas such as the Fitzpatrick wilderness and the Bridger wilderness. Increasing emissions of Volatile Organic Carbon (VOC) and other condensible emissions from sources in southwest Wyoming are becoming a rapidly escalating concern for the Forest Service. The net emissions increase of 3298 Tons Per Year VOC that Solvay is requesting, in conjunction with other concurrent and upcoming VOC increases from other soda ash and oil and gas facility development may have the potential to produce a significant impact to visibility in the Class I wilderness areas.

However it is impossible for the Forest Service to accurately assess the potential impact of these sources concurrent increase in VOC emissions without a cumulative impacts assessment. As shown in Figure 2-1 in the Solvay PSD permit, Solvay and four other soda ash facilities are located within about a 12 mile radius of each other. Therefore, we request that the State of Wyoming considers the Solvay permit to be incomplete until either the proponent or the Southwest Wyoming Technical Air Forum (SWWYTAFA) conducts a modeling analysis to determine the contribution of these five trona facilities and other locally contributing sources to visibility impairment in the Bridger and Fitzpatrick Class I wilderness areas.

SOLVAY2016_1.4_000604

We appreciate the opportunity for review of this PSD permit application and provide the Division with our comments and concerns regarding potential impacts of Forest Service Class I wilderness areas.

Please contact Dennis Haddow (303-275-5053), Tamara Blett (303-275-5744) or Ann Mebane (307-739-5723) if you have questions or if further discussion on these issues is needed.

Sincerely,



BJORN DAHL
Director, State and Private Forestry

cc: Kevin Golden, EPA
Dolly Potter, Solvay Soda Ash
Sandra Key, Bridger Teton NF
Becky Aus, Shoshone NF
Bob Reese, Pinedale Ranger District
Clif Benoit, Forest Service Region 4
Ann Mebane, Pinedale Ranger District